

12/8/16

DOJ Proposed Language for Proposed Order related to Motion Seeking Retention of Keen-Summit Capital Partners

Insert a new paragraph 12. Change existing paragraph 13 to be paragraph 14.

12. Nothing in this Order relieves Debtors of any obligation they have under the 1990 consent decree in United States v. Occidental Chemical Corporation, et al., No. 89-5064 (D.N.J.) including, without limitation, the obligations set forth in Section III.D of the consent decree related to transfer of the properties owned by Tierra Solutions, Inc. located at 80 and 120 Lister Avenue, Newark, New Jersey, or of any obligation under any other judicial or administrative order regarding Debtor-owned property.